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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	Case No. 4:05-cr-036 (RRB)
)	
Plaintiff,)	
)	
vs.)	<u>UNOPPOSED MOTION TO</u>
)	<u>CONTINUE CHANGE OF PLEA</u>
)	
MITCHELL ELLIS ASHER,)	
)	
Defendant.)	

COMES NOW Plaintiff, the United States of America, and moves the Court to continue the Change of Plea now set for 10:00 o'clock a.m. on April 14, 2006, for approximately four (4) weeks from and after that date, to a date reasonably near the 12th of May, 2006.

The reason for this request is that the parties are in agreement regarding the main outlines of a settlement, which will include filing a superseding information to cover certain conduct subsequent to that charged in the Indictment, in order to resolve these outstanding potential charges within the present case. The delay is occasioned

by the fact that the evidence must come from Florida, and while most of that evidence is in hand, it is not yet complete, and it requires accounting analysis. This prevents drafting the additional charges in the superseding information to which the defendant will plead.

It now seems likely that the superseding information may be prepared and filed in approximately a week or ten days, allowing the remainder of the requested extension to draft and circulate the plea agreement, obtain all required signatures, and file it in Court in advance of the change of plea proceedings.

Defense counsel agrees with this requested extension.

WHEREFORE, plaintiff respectfully requests that the current setting of April 14 for change of plea be reset to May 12, or a convenient date near that date.

DATED this 5th day of April, 2006, at Fairbanks, Alaska.

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